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July 14, 2015

VIA ECF

The Honorable Leda D. Wettre, U.S.M.J.
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street, Room MLK 4A
Newark, NJ 07101

**Re: John Wiley & Sons, Inc., et al. v. Eduardo Rivadeneyra, et al.
Civil Action No. 13-1085(MCA)(LDW)**

Dear Judge Wettre:

I, together with Oppenheim + Zembrak, LLP, am counsel for Plaintiffs in the above-captioned case. I write in connection with the letter filed last night by Dennis F. Gleason, Esq. on behalf of Sterling Educational Media ("Sterling"), seeking entry of a protective order or, alternatively, that the Court conduct an *in camera* review of certain documents. We respectfully request that we be given ten (10) days to respond to Sterling's request.

As indicated in Sterling's submission, we have been attempting to work with Sterling to resolve issues concerning its production, and the corresponding issues Sterling raises about documents included in Defendants' most recent production. With regard to the latter, last evening, Defendants produced documents pursuant to the Court ordered deadline. However, that production was made directly to Plaintiffs' outside vendor with the understanding that we would not review documents included in that production which are subject to Sterling's objection until the issues raised by Sterling are resolved. Indeed, at this point, we do not know whether the thirty emails referred to in Mr. Gleason's letter as being in dispute are even included in Defendants' production.

If given ten (10) days within which to respond to Sterling's request, we would have the opportunity to meet and confer. While we may not be able to resolve the dispute entirely, we may very well be able to narrow the issues which will require the attention of the Court. Accordingly, we respectfully request that the Court delay consideration of Sterling's application at this time, and that Plaintiffs not be required to respond until July 24th in order to allow an opportunity to meet and confer.

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Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink that reads "Karen A. Confoy". The signature is written in a cursive, flowing style.

Karen A. Confoy

KAC:nmn

cc: Matthew J. Oppenheim, Esq.
Thomas J. O'Grady, Esq.
Dennis F. Gleason, Esq.